

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: Violation of NESHAPS Regulation 61.22(c)

DATE: July 2, 1976

FROM:

Gale A. Wright
Gale A. Wright

TO:

H. F. Rompage

A field inspection conducted by Mr. William H. Longston, SVAN, has confirmed that the GAF Corporation, Building Products Division, 9215 Riverview Drive, St. Louis, Missouri, is in violation of the subject regulation.

I have attached the file for this source which contains Mr. Longston's report and the laboratory evaluation of the material collected from the baghouse vent. This laboratory analysis confirms the presence of asbestos.

Please prepare a Notice of Violation.

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Superfund

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: NESHAPS Investigation Report Follow-up
GAF Corporation, St. Louis, Missouri

FROM: G. E. Stigall *E. Stigall*
Chief, Technical Services Branch, Region VII

TO: Mr. Earl J. Stephenson
Director, Enforcement Division, Region VII

ATTN: Mr. Patrick K. Monahan
Chief, Legal Branch, Region VII

DATE: June 23, 1976

Attached is the laboratory analysis report of a sample collected on June 8, 1976, from the GAF Corporation, St. Louis, Missouri. This verification of the asbestos content indicates a definite violation of [40 CFR 61.22(c)] as indicated in the June 17, 1976, NESHAPS Investigation of this facility.

In addition to this report, three photographs of this main baghouse exhaust are included. Note particularly picture Number 14 which shows clearly the extent of the violation.

2 Attachments

RECEIVED
JUN 27 2 10 PM '76
EPA
REGIONAL OFFICE
KANSAS CITY MO.

June 17, 1976

NESHAPS INVESTIGATION

GAF Corporation
Building Products Division
9215 Riverview Drive
St. Louis, Missouri

A reinspection tour of this facility was made at 9 a.m. on June 8, 1976, by Richard Knapp, City of St. Louis, Division of Air Pollution Control, Department of Public Safety, and William H. Longston, Surveillance and Analysis Division, Environmental Protection Agency. The inspection tour was provided by William Neal, Personnel Manager and Safety Manager.

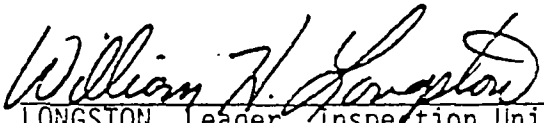
The original inspection of this facility was made on February 4, 1976. See the report dated February 23, 1976. At the time of the original inspection, the scrap pulverizer and several other minor processes were not in operation and therefore not venting to the main baghouse. It was noted that the plant was in compliance but a reinspection would be necessary when the scrap pulverizer was operational. The reinspection showed emissions from the baghouse at a level of 10 to 20 percent opacity. Samples of material which had been collected on the underside of the cap on this stack were collected and returned for asbestos analysis. Results of this analysis will be forwarded as soon as possible.

Compliance Status

The main baghouse exhaust system was determined to be in violation of the hazardous air pollution regulation [40 CFR 61.22(c)]. The facility was informed that the emissions observed were a violation and that they would be further contacted by the Environmental Protection Agency.

Recommendations

It is recommended that the Enforcement Division take appropriate action consistent with this determination of violation.


LONGSTON, Leader, Inspection Unit


SPRATLIN, Chief, Air Section

SUBJECT: Analysis of the GAF Sample

DATE: June 17, 1976

FROM: Charles P. Hensley *CPH*
Inorganic Working Unit Leader, Laboratory Branch, Region VII

TO: Donald A. Townley, P.E. *DA*
Director, Surveillance and Analysis Division, Region VII

ATTN: William A. Spratlin, Jr., P.E. *WAS*
Chief, Air Section, Region VII

The GAF sample taken June 15, 1976, by William H. Longston was analyzed for asbestos by the microscopical dispersion staining method. About 25 percent of the particles were identified as chrysotile asbestos.